

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

ROBERT F. KENNEDY HUMAN RIGHTS,
et al.

Plaintiffs,

v.

U.S. DEPARTMENT OF HOMELAND
SECURITY, *et al.*

Defendants.

Case No. 1:25-cv-4349-AS

DECLARATION OF ANTHONY ENRIQUEZ

I, Anthony Enriquez, declare as follows:

1. I am over the age of 18 and competent to testify to the matters described below.

This declaration is based on my personal knowledge and information that has been shared with me through conversations with my colleagues.

2. I am the Vice President of U.S. Advocacy and Litigation at Robert F. Kennedy Human Rights (RFKHR) and have held this position since January 2022.

3. RFKHR is a nonpartisan, nonprofit organization with offices in New York City and Washington, D.C. The organization was created in 1968 to carry on Senator Robert F. Kennedy's legacy and advance his unfinished work in pursuit of a more just and peaceful world. Today, the organization contains three main departments: a Human Rights and Education program, a Business and Human Rights program, and an Advocacy and Litigation program, subdivided between U.S. and International teams. A Marketing and Communications team works with each of these departments to further their missions of disseminating information to protect and promote respect

for human rights. The organization employs 43 staff members. The U.S. Advocacy and Litigation program comprises 5 full-time employees, including me.

4. The U.S. Advocacy and Litigation program partners with grassroots human rights defenders to reduce mass incarceration in the United States. The program exposes and stops human rights abuses in the U.S. criminal and immigration legal systems, including state-sponsored racial discrimination, torture, arbitrary detention, and extrajudicial killings that occur at the hands of U.S. police and prison and detention center officials.

5. A chief focus of our work is informing the public of human rights abuses that occur in immigration detention centers in the United States for the purpose of supporting grassroots movements advocating for an end to the arbitrary use of detention. We regularly publish op-eds, original commentary, and letters to the editor in local and national print media about these abuses. We also publicize on our website communications detailing human rights abuses that have been filed with human rights oversight bodies in the U.S. government, the Inter-American Commission on American States, and the United Nations.

6. We also publish original human rights reports that disseminate information and examples of human rights abuses inflicted in immigration detention centers. In August 2024, we published a human rights report titled “Inside the Black Hole: Systemic Human Rights Abuses against Immigrants Detained and Disappeared in Louisiana.” I am one of two principal co-authors of the report.

7. The report is based on over 6,000 interviews with people held in Louisiana immigration detention centers, collected over two years in the course of monthly visits by staff from RFKHR and other community partners. It contains first-hand accounts of violations of civil and human rights, including physical and sexual abuse by guards; torturous conditions of

confinement like solitary confinement lasting months, sleep deprivation, and punitive exposure to extreme temperatures; suppression of speech and religious worship protected by the First Amendment; denial of medical care for chronic, urgent, and emergency conditions that has led to preventable illness and death; and discrimination from officials on the basis of race, gender, sexual orientation, and disability, among other abuses. It is published on the RFKHR web site.

8. Following the arrests and transfer to isolated immigration detention centers of non-citizen student protesters in early 2025, reporters sought RFKHR expert commentary on abusive conditions of confinement in Louisiana immigration detention, and frequently cited our human rights report, including in stories by the Washington Post, CNN, Newsweek, NBC News, and the Wall Street Journal.

9. Because of RFKHR's recognized role as a trustworthy source of information on immigration detention and human rights, local, national, and international journalists regularly seek our expertise on human rights issues. In 2025 alone, RFKHR employees have earned 95 placements in national and international print media, placed 15 op-eds and letters to the editor, and been interviewed by 25 journalists regarding human rights issues.

10. RFKHR also leverages social media to disseminate information on human rights to millions of people. The combined accounts of RFKHR and its President Kerry Kennedy across social media platforms Instagram, Facebook, X (formerly Twitter), LinkedIn, TikTok, Threads, and BlueSky have more than 375,000 followers.

11. In June 2025, an Instagram post from RFKHR containing a video that spotlights a man who suffered abuse in a Louisiana detention center generated over 1 million views and 76,000 likes on Instagram.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 11, 2025

/s/ Anthony Enriquez
Anthony Enriquez